



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8

1595 Wynkoop Street
DENVER, CO 80202-1129
Phone 800-227-8917
<http://www.epa.gov/region08>

Ref: 8EPR-N

OCT 22 2012

Craig Bobzien, Forest Supervisor
Black Hills National Forest
c/o Katie Van Alstyne
1019 N. 5th Street
Custer, South Dakota 57730-8214

RE: EPA Comments on Final Environmental
Impact Statement, Mountain Pine Beetle Response
Project, CEQ #20120304

Dear Mr. Bobzien:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA), 42 U.S.C. Section 4321, *et seq.*, and Section 309 of the Clean Air Act, 42 U.S.C. Section 7609, the U.S. Environmental Protection Agency Region 8 (EPA) has reviewed the September 2012 Final Environmental Impact Statement (FEIS) for the Mountain Pine Beetle Response Project. This FEIS was prepared by the U.S. Department of Agriculture Forest Service (USFS) Black Hills National Forest to analyze potential environmental impacts associated with the project's proposed vegetation treatments. These treatments are proposed as a demonstration project to address the unique circumstances that currently exist on the forest due to the peak of a mountain pine beetle (MPB) epidemic.

The EPA provided comments on the Draft EIS (DEIS) with a June 25, 2012 letter. The DEIS analyzed three alternatives, but no Preferred Alternative was identified. The action alternatives included potential vegetation management activities on acreage ranging from 242,000 to 248,000 acres, with related new roads ranging from 0 to 70 miles depending on the alternative. The EPA's primary concerns with the DEIS were related to level of analyses, aquatic resources and adaptive management/monitoring.

The FEIS identifies the Preferred Alternative as a modified Alternative C with potential vegetation management activities on 248,000 acres and 60 miles of new road construction. The FEIS includes an expanded description of existing watershed conditions, potential treatment areas and impacts. Supplemental information is also provided in Appendix A, Response to Comments, Appendix B, Design Criteria, Mitigation Measures and Monitoring, and Appendix E, Maps. With the expanded discussion and additional information, the FEIS provides a more thorough disclosure of existing conditions and potential impacts.

Level of Analyses and Aquatic Resources

The FEIS in Chapter 3 includes an expanded Watershed section which provides more detail related to existing watershed conditions and updated surface water and water quality information. In addition, a map of wetlands and watershed influence zones within the Forest has been added to Appendix E. The direct and cumulative effects on target watersheds have been clarified and project design criteria have been expanded to include reservoirs in the types of water bodies protected.

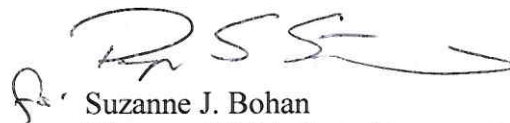
The site-specificity of this analysis, as it pertains to preventive thinning to reduce stand susceptibility to beetles and fire, is not as detailed as we have seen in other vegetation management projects. However, given the lack of surface water features within the project area, the design criteria for preventing soil loss, and the strong revegetation rate on much of the Forest, it does not appear this project will lead to significant impacts to aquatic resources.

Adaptive Management and Monitoring

We appreciate that the FEIS contains a greatly expanded adaptive management and monitoring discussion. Appendix B provides important details related to how the adaptive management process and use of integrated pest management techniques will be implemented on the ground from project beginning (i.e., "prior to implementation" requirements) to end (i.e., annual report of accomplishments detailing locations, treatments and related activities for implementation for completed actions). Table B-1, Integrated Pest Management Framework, is a valuable addition to the FEIS that provides information on tools/techniques, purpose, scope/scale and management evaluation points. In addition, the monitoring discussion has been expanded to address how monitoring will be implemented and what steps may be taken if resource protection objectives are not being achieved. We will be very interested to watch this project as it unfolds and to learn of your experience with its implementation and effectiveness.

We appreciate the opportunity to review this FEIS. If we may provide further explanation of our comments, please contact me at 303-312-6925, or your staff may contact Amy Platt at 303-312-6449.

Sincerely,

A handwritten signature in black ink, appearing to read "S. Bohan", with a stylized flourish at the end.

Suzanne J. Bohan
Director, NEPA Compliance and Review Program
Office of Ecosystems Protection and Remediation